



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 13, 2007

Reply To
Attn Of: ETPA-088

Ref: 98-024-AFS

Sharon LaBrecque
Planning Staff Officer
2647 Kimberly Road East
Twin Falls, ID 83301

Dear Ms. LeBrecque:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft supplemental final Environmental Impact Statement (DSFEIS) for the proposed **Southwest Idaho Ecogroup Land and Resource Management Plans** (CEQ No. 20070216) according to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DSFEIS was prepared to supplement the Rangeland Resources section of the 2003 final EIS to identify capable management indicator species (MIS) habitat on National Forests System lands within the Southwest Idaho Ecogroup- Boise, Payette and Sawtooth National Forests. The MIS described in this document are White-headed woodpecker, Pileated woodpecker and Greater sage-grouse. We appreciate the supplemental information regarding the MIS. The EIS focuses on grazing allotments and the relationship to these MIS. The EIS states that grazing does not have a measurable effect on the woodpecker species. However, sage-grouse habitat is directly affected by grazing activities and by the cumulative effects of wildfire, roads, grazing and human disturbance.

We have rated the EIS LO (Lack of Objection) based on our review. We have included the explanation of the rating system for your reference. We support taking a hard look at how grazing affects MIS habitat. We would like to stress the importance of noxious weed management, which was one issue identified in the EIS as affecting MIS habitat. We believe that grazing can exacerbate the spread of invasive vegetation through the vector of livestock movement, disturbing native vegetative growth and carrying invasive seeds with them as they move. The EIS states that subsequent changes in livestock management may be appropriate, but that restoration activities are also critical. It also states that changes in grazing management strategies or even complete removal of grazing would not result in the improvement of some ecological states. We support the Forests' management directions and objectives, which aim to address lands in less than satisfactory condition, which is based on MIS habitat as well as reducing grazing when needed. We also support the 2006 Conservation Plan discussed in the EIS, which states that it should sustain greater sage-grouse habitat through promoting sustainable livestock management strategies, which support desired native perennial grasses and forbs. It would have been helpful to include in the FEIS any monitoring information from this Plan that

might have occurred since its implementation. Also, the EIS states (pg 14) that practices that promote the sustainability of desired native perennial grasses and forbs should sustain Greater-sage grouse habitat. We support such practices and recommend a stronger commitment to ensure implementation of these activities so that MIS habitat will be sustained through restoration and sustainable grazing.

Thank you for the opportunity to comment on the EIS. If you have questions or would like to discuss these comments, please contact Lynne McWhorter of my staff at (206) 553-0205.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit